

December 8, 2009

Ms. Laura Sinram  
Senior Campaign Finance Analyst  
Federal Election Commission  
999 E Street NW  
Washington, DC 20463

Dear Ms. Sinram:

The National Republican Congressional Committee (FEC ID# C0075820) is in receipt of your Request for Additional Information dated November 4, 2009 regarding our 2009 August Monthly FEC report.

The Committee believes its procedures are in compliance with the best efforts and donor identification provisions cited in your letter. As an initial matter, all committee solicitations request the donor's first name, middle name or initial, and last name; notify the donor that the Committee is required to report occupation and employer information; and request that the donor provide such information. For those donors who choose not to provide the occupation and employer information, the Committee (within thirty days of receiving the contribution) sends the required follow-up letter, which asks the donor again to provide the information, and again advises the donor of the Committee's obligation to report the information. These follow-up letters include a postage-paid return envelope for the donor's convenience. Finally, all such information received, including the contributor's address, is reported.

Any additional information received subsequent to the filing of the original report will be included on the amendments to be filed by the Committee.

With respect to the information that is provided by the donors, the regulations cited in your letter require that we ask contributors to supply employer/occupation information, but do not compel the contributors to comply with the Committee's requests. The Committee has reported all the donor identification information it has in its possession in an attempt to satisfy both the intent and the substance of 11 CFR 100.12, 11 CFR 104.3, and 11 CFR 104.7. In addition, the Committee can find no guidance in the statute or regulations that allow it to add to or subtract from any identification information that is voluntarily provided to it from its contributors, nor is there any indication in the statute or regulations that the descriptions referred to are inadequate listings for employer and/or occupation. In addition, the Committee notes that it updates its employer/occupation data as it is received from donors.

The Committee has reviewed all reimbursements to individuals for travel and subsistence and can as you requested confirm that no further itemization is required under any Commission regulations for these expenditures.

Mrs. Lucy Naquin contributed \$ 1,000 on 4/27/09, as reported on a Schedule A on our May 2009 monthly report. Mrs. Naquin contributed another \$ 1,000 on 5/27/09, as reported on a Schedule A on our June 2009 monthly report. Each donation was made via a personal credit card.

Then Mrs. Naquin requested a full refund, and on 7/24/09, the Committee issued a refund check for \$ 2,000, as reported on a Schedule B (line 28A) on this August 2009 monthly report. Subsequently, the Committee was notified that Mrs. Naquin had initiated chargebacks for each of her two \$ 1,000 credit card donations. One debit for \$ 1,000 was charged to the Committee on 7/1/09, and the other \$ 1,000 debit was charged to the Committee on 7/20/09. Both chargebacks were reported on Schedule A of this report, as referenced in your letter. The Committee has contacted Mrs. Naquin regarding this matter.

Mr. Ernest Pighini made a \$ 3,000 personal donation to the Committee on 5/7/09, and then requested a refund for this

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## **ETEXT ATTACHMENT**

donation. The refund for \$ 3,000 was issued on 5/15/09. Both transactions were reported on our June 2009 monthly report.

Mr. Pighini subsequently notified the Committee that he no longer desired a refund, and requested that we void his refund check. The refund check was voided on 7/24/09, as reported on Schedule B (line 28A) of this August 2009 monthly report.

Sincerely:

Keith A. Davis, Treasurer  
National Republican Congressional Committee

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